

SETTLEMENT AGREEMENT

By and through their undersigned counsel, the State of Vermont (the “State”), the Vermont Democratic Party (“VDP”), and the Burlington Democratic Committee (“BDC”) hereby agree to resolve the campaign finance complaint dated April 20, 2020, as follows:

WHEREAS, a complaint dated April 20, 2020, was filed with the Vermont Attorney General’s Office alleging that the VDP and BDC had violated campaign finance laws regarding the March 3, 2020 Town Meeting Day election;

WHEREAS, on May 20, 2020, the Attorney General’s Office notified VDP and BDC of the complaint;

WHEREAS, on June 19, 2020, BDC filed its 2020 Town Meeting Day campaign finance reports to correct the identified error;

WHEREAS, on September 25, 2020, VDP filed its 2020 Town Meeting Day campaign finance reports to correct the identified error;

WHEREAS, the State, VDP, and BDC agree that the following facts are true and accurate:

1. VDP is a Vermont political party, required to register with the Secretary of State’s Office under 17 V.S.A. § 2923, that received contributions and made expenditures of more than \$1000 in support of candidates for Burlington City Council during the 2019-2020 local election cycle.
2. BDC is a local unit of a Vermont political party, required to register with the Secretary of State’s Office under 17 V.S.A. § 2923, that received contributions and made expenditures of more than \$1000 in support of candidates for Burlington City Council during the 2019-2020 local election cycle.

3. Registered political parties are required by 17 V.S.A. § 2964(b)(1) to file periodic campaign finance reports related to local elections with the Vermont Secretary of State.

4. VDP's and BDC's campaign finance reports related to the March 3, 2020 Town Meeting Day election were due on February 2, 2020; February 22, 2020; and March 17, 2020.

5. BDC did not file any campaign finance reports on February 2, 2020; February 22, 2020; or March 17, 2020.

6. VDP did not file any campaign finance reports on February 2, 2020; February 22, 2020; or March 17, 2020.

7. VDP's and BDC's failure was a violation of 17 V.S.A. § 2964(b)(1).

8. On May 20, 2020, the Attorney General's Office notified VDP and BDC that it had received a complaint about VDP's and BDC's failure to file campaign finance reports related to the March 3, 2020 Town Meeting Day election.

9. On June 19, 2020, BDC filed all three required campaign finance reports related to the March 3, 2020, Town Meeting Day election.

10. On September 25, 2020, VDP filed all three required campaign finance reports related to the March 3, 2020, Town Meeting Day election.

WHEREFORE, the State, VDP, and BDC agree to settle this matter as follows:

A. The State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement against, VDP or BDC, or VDP's or BDC's employees or agents, for violations of Vermont's campaign finance statutes based on the failure to file campaign finance reports related to the March 3, 2020 Town Meeting Day election.

B. VDP and BDC agree to pay a total of \$2,750 to the State as a civil penalty within thirty (30) days of the signing of this Settlement Agreement.

STATE OF VERMONT

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VERMONT DEMOCRATIC PARTY

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